

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

FILED

FEB 07 2022

Clerk of Court, United States District Court
Ohio Northern District - CLEVELAND

Regina Bryant

Plaintiff

-vs-

Denis McDonough

Secretary U.S Department of
Veterans Affairs

Defendant(s)

CASE NO.

1:22 CV 00207

JUDGE

JUDGE POLSTER

MAG. JUDGE PARKER

COMPLAINT

- 1. Retaliation: participation
in EEO Activity.**
- 2. 10.7 Civil Right –Title VII-
Hostile Work Environment
caused by Non –
Immediate Supervisor or
by Co-worker claim based
on Negligence**

The Parties

Plaintiff:

**Regina Bryant
11410 Scottwood Ave
Cleveland, Ohio 44108**

Plaintiff: Regina Bryant has worked as a Sterile Processing Tech as a surgical instrument tech at Louis Stokes VA Medical Center Cleveland for over eight years. Plaintiff has a learning disability and is in a protective class, hired at VA medical center as a Schedule A candidate. The plaintiff seeks damages from the defendant for Retaliation for engaged in an EEO Activity, and hostile work environment, harassment caused by non-immediate supervisor or by co-worker claim based on Negligence.

Defendant:

**Denis McDonough
The Head of the Department of Veterans
Veteran Affairs Building
810 Vermont Avenue
Washington D.C**

Defendant: Denis McDonough the Head of the Department of Veterans (the Secretary of Veterans Affairs) the defendant or a member of the defendant's management knew or should have known of the harassment and failed to take prompt, effective remedial action reasonably calculated to end the retaliation and the harassment.

Statement of the Claim(s)

The plaintiff (Regina Bryant) was subjected to unfair scheduling practices. The Plaintiff was scheduled back to back heavy duties for months and forced to work in a Hostile Work Environment.

Claim(s) Basis

Claims Basis on Reprisal for engaged in an EEO Activity. Hostile Work Environment, Harassment, based on 10.7 Civil Right – Title VII- Hostile Work Environment caused by Non –Immediate Supervisor or by Co-worker claim based on Negligence.

Under Title VII of Civil Right act of 1964

The Lead tech of Sterile Processing department of the Louis Stokes VA Medical center retaliated against the plaintiff for participating in EEO Activity. The plaintiff (Regina Bryant) was also subject to retaliation by lead tech Kara Deal, in the form of unfair scheduling.

The lead tech who made up the work schedule for the staff, would schedule the Plaintiff back to back heavy duty, from months. The assignment required the plaintiff to push and pull case cart to OR, going to all the clinics in the hospital to pick up instruments, going to the warehouse, working in decontamination, and working on the Autoclave. The lead tech would take plaintiff off her original assignments and reassign her to the assignment that had the heavier workload. All these assignments require the plaintiff to be on her feet for 8 hours straight.

The lead tech (Kara Deal) would also reassign the plaintiff that so she would always be force to work back to back the heavier work load. This went on for months. The plaintiff would complain to management, but nothing was done to stop the Retaliation.

The effect on plaintiff physically from being forced to stand on her feet back to back cause plaintiff's legs, feet and ankles to swollen. The plaintiff could hardly walk to her car, when it was time to leave work because her legs, feet and ankles were so swollen.

The result of plaintiff being assigned to these heavy duty back to back was that she develop Varicose Veins in both legs. The varicose vein are permanent. Plaintiff's doctor prescribed compression stocking for the muscle cramping, and swelling in plaintiff's lower legs.

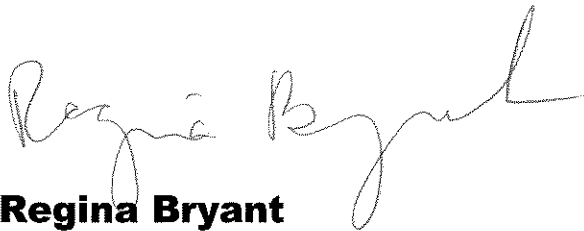
The plaintiff cannot wear short pants or dresses because she is afraid of people seeing how horrible her legs look because of the varicose veins.

In addition to the claim stated the lead tech (Kara Deal) created a hostile work environment for the Plaintiff. The stress from this causing the plaintiff to have both emotional and mental distress.

Damages

The plaintiff is asking the court to be given award of both compensatory damage and punitive damage.

The plaintiff is asking for a lump sum of money. The plaintiff is also asking that the court allowed her to move be up 3 step in the GS grade and step system. To retire when this case is over with her full salary for the rest of her life.

A handwritten signature in cursive script, appearing to read "Regina Bryant", written in black ink.

Regina Bryant